UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF NEW YORK

PAUL MURPHY, Regional Director of Region 3 of the National Labor Relations Board, for and on behalf of the NATIONAL LABOR RELATIONS BOARD,

Petitioner,

DECLARATION OF ANDREA CHAMPION

v.

CAYUGA MEDICAL CENTER,

Civil Action No.: 3:17-MC-00004 (TJM)(ATB)

Respondent.

STATE OF NEW YORK) ss.: COUNTY OF TOMPKINS)

- I, Andrea Champion, declare, upon personal knowledge and under penalty of perjury that the following is true and correct:
- 1. I am employed as the Director of Emergency Service at Cayuga Medical Center ("CMC"). I have been in this role since approximately October 3, 2016. Part of my job duties require me to supervise the approximately 30 RNs in the Emergency Service Department.
- 2. In or around the middle of February, Cheryl Durkee, a RN in the Emergency Service Department, was in my office and stated: "In case you have not heard, I am not only a Union supporter, but I am a Union organizer." I responded that she had every right to unionize or not as an employee and it didn't matter to me as I had worked in both worlds.
- 3. Ms. Durkee, along with several other employees in the Emergency Service Department, continue to wear SEIU or "Organize" pins and/or paraphernalia.

Dated: March 3, 2017

Andrea Champion

Sworn to before me this 3 th day of March, 2017.

NOTARY PUBLIC

Lorrie A. Mahoney
Notary Public, State Of New York
No. 01MA6149952
Qualified in Tompkins County
Commission Expires 7/17/2018